

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JEFFREY MOORE,

Plaintiff,

-VS-

Case No. 08 C 1399  
Hon. William Andersen

JAMES G. RUEHLMANN, JR., JAMES RUEHLMANN, SR.,  
and DONNA RUEHLMANN, Jointly and Severally,

Defendants.

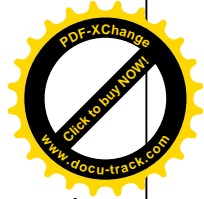
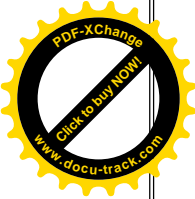
SOMMERS SCHWARTZ, P.C.  
Andrew Kochanowski (P55117)  
Michael J. Cunningham (P32795)  
Attorneys for Plaintiff  
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CECIL F. BOYLE, JR. (ARDC 6250537)  
Co-Counsel for Plaintiff  
330 North Wabash Avenue, Suite 2900  
Chicago, Illinois 60611  
(312) 261-5167

**PLAINTIFF'S REQUEST TO ADMIT DIRECTED  
TO DEFENDANT JAMES RUEHLMANN, JR. PURSUANT TO FRCP 36**

NOW COMES Plaintiff, JEFFREY MOORE, by and through his attorneys, SOMMER SCHWARTZ, P.C., and pursuant to FRCP 36, requests that Defendant, JAMES RUEHLMANN, JR., admit the truth to the following statements, within the next thirty (30) days.



1. That on March 19, 2007, Defendant, JAMES RUEHLMANN, JR., was the operator of a 2000 Jeep Grand Cherokee bearing Ohio License Plate Number CEM 5870, with Plaintiff, JEFFREY MOORE, as a passenger, and was proceeding westbound on Broadway Avenue at the intersection of 19th Avenue South, in the City of Nashville, State of Tennessee.

**RESPONSE:**

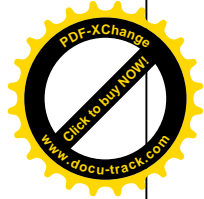
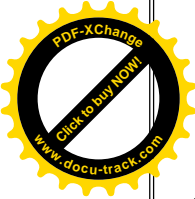
2. That on March 19, 2007, Defendant, JAMES RUEHLMANN, JR., owed Plaintiff, JEFFREY MOORE, the duty to operate said vehicle in a careful and prudent manner, in accordance with the statutes of the State of Tennessee, pertaining the operation of a motor vehicle upon the highway.

**RESPONSE:**

3. That on March 19, 2007, Defendant, JAMES RUEHLMAN, JR., breached his duty to the Plaintiff, JEFFREY MOORE, by going through a red light at the intersection of Broadway Avenue and 19th Avenue South in the City of Nashville, State of Tennessee.

**RESPONSE:**

4. That as a result of going through the red light at the intersection of Broadway Avenue and 19th Avenue South, the Defendant, JAMES RUEHLMANN, JR., caused a collision to occur with another vehicle in the intersection, thereby resulting in physical injury to Plaintiff, JEFFREY MOORE.



**RESPONSE:**

Respectfully submitted,

SOMMERS SCHWARTZ, P.C.

/s Michael J. Cunningham P32795

Attorney for Plaintiff

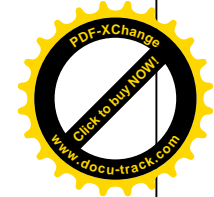
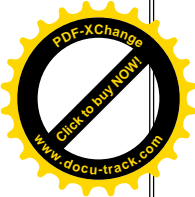
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Dated: August 21, 2008



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**CERTIFICATE OF SERVICE**

I hereby certify that on , I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

/s Michael J. Cunningham P32795  
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